REMARKS

Claims 1-9, 12-48 and 53-70 are pending.

Claims 1-9, 12-48 and 53-62 stand rejected.

Claims 1, 2, 4, 5, 7-9, 12, 14, 15, 17, 19, 28, 29, 33, 53, 54, 56, 58, 60, 64, and 66-69 have been amended. Claim 64 has been amended to correct a minor typographical error. No new matter has been added.

Claims 71-73 have been added.

Claim Rejections - 35 U.S.C. § 103

I.

Claims 1, 8, 9, 12-17, 23-48, 58-66 and 70 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Application No. 2005/0055420 to Wyler (referred to herein as "*Wyler*") in view of U.S. Patent No. 6,941,511 to Hind et al. (referred to herein as "*Hind*"), and further in view of U.S. Patent No. 6,009,436 to Motoyama et al. (referred to herein as "*Motoyama*"). Applicant respectfully traverses the rejection.

Wyler relates to a system for providing information in a form suitable for display to a user on a wireless device. *Wyler*, Abstract.

Referring to Figure 1 and paragraphs 0159-0167 of *Wyler*, *Wyler* teaches that an application "searches the Web source page or an input text file for Markup languages, Java, Java Script or *Rich* Text Format properties and determines what kind of process is needed in order to transform its information into objects." *Wyler*, para. 0158. Regardless of the properties of the selected document or the corresponding process used, *Wyler* teaches that the source document is translated into M2O script language, where the source document is the Web source page or an input text file. From Figure 1 and para. 163 of *Wyler*, the conversion processes can be chained, if necessary, to generate the M2O script language, i.e. process 30 can convert the format created in process 20 to generate the M2O script language, process 40 can convert the format created in process 30 to generate the M2O script language, and so on. Regardless of whether the processes

20, 30, and/or 40 are chained or not, *Wyler* clearly teaches that the source document is converted only once. All other conversions are chained and, thus, operate on previous conversions not the source document. In contrast to the teachings and suggestions of *Wyler*, claim 1 recites "applying the first first-level transform to **the internal representation** to create a first first-level document" and "applying the second first-level transform to **the internal representation** to create a second first-level document". Thus, in claim 1, two first-level documents are generated by applying transforms to the same internal representation." Applicants respectfully submit that the foregoing recitations of claim 1 are clearly distinguished from the foregoing teachings of *Wyler*.

Wyler also teaches that the M2O script format is formatted into a specific wireless display format or into a book style document. *Wyler*, Figure 1. *Wyler* further teaches that a "user is able to set specific filtering criteria for some objects in order to enhance the application sensitivity to specific objects (either to include or exclude these objects)." *Id.*, para. 0354. Thus, assuming, without admitting, that multiple users can set different filtering criteria, then the M2O script format can be converted into different, final outputs. Even assuming, without admitting, that the conversion from M2O script format to the different, final outputs represents a translation from an internal representation to a first-level document, because the outputs are final, *Wyler* fails to teach or suggest "reading a second-level transform from the transform database" and "applying the second-level transform to the first first-level document to create the second-level document" as required by claim 1. Claim 1 also makes clear that "the first first-level document and the second first-level document are different."

Motoyama teaches the transformation of a first structured information format, e.g. an SGML document, to a second structured information format, e.g. an HTML document. A transformer 186 performs the transformation from an SGML document to an HTML document using as input SGML document type definition (DTD) and HTML DTD files or a currently existing map. *Motoyama*, col. 3, lines 27-57 and col. 10, line 65 through col. 11, line 23. The user has some flexibility in the transformation process. More specifically, *Motoyama* teaches that the "user is provided options for transformation of the individual source components." *Id.*, col. 3, lines 47-49. Even assuming, without admitting, that the user could transform the SGML document into different HTML documents by selecting different options for transformation each

time, there is still only one level of transformation, e.g. an SGML document to an HTML document. Thus, *Motoyama*, as with *Wyler*, fails to teach or suggest "applying the <u>first</u> first-level transform to **the internal representation** to create a <u>first</u> first-level document", "applying the <u>second</u> first-level transform to **the internal representation** to create a <u>second</u> first-level document", and "<u>applying the second-level transform to the first first-level document to create the second-level document</u>". Claim 1.

The Examiner on page 21 of the October 27, 2006 Office Action states that the "use[r] is allowed to select an input SGML DTD or an existing map to map source components to a target component ([*Motoyama*], col. 3, lines 40-55)." Office Action, page 21. The Office Action further states that the "examiner interprets the existing map as the first level of transformation and the target component as the second level of transformation." *Id.* Applicant respectfully disagrees with this interpretation. Applicant respectfully submits that *Motoyama* teaches that the "existing map" and the "DTD" are pre-existing inputs to be used as part of the source document to HTML transformation process and, thus, are not transformations themselves.

Hind relates to "a method, system, and computer program product for applying transformations to extensible documents, enabling reductions in the processing time required to transform arbitrarily-structured documents having particular well-defined elements." *Hind*, Abstract.

Applicants respectfully submit that the differences between claim 1 and the teachings of *Wyler* in view of *Motoyama* and *Hind* are not insignificant. The present application describes the generation of multiple documents of the same level transformed from the same source document and the subsequent transformation of at least one of the multiple documents into a second-level document, e.g. see Present Application, Figure 3, document 300 to Silver 311 and Gold 312 and document Silver 311 to document Bar 322. This process allows generation of multiple customized documents both on the same level and at least one to a next level. See Present Application, p. 6, lines 22-29. Note, the invention is defined by the claims and not limited by specific embodiments described in the "Description" within the Present Application.

Accordingly, Applicant respectfully submits that *Wyler* in view of *Motoyama* and *Hind* fails to teach or suggest "applying the <u>first</u> first-level transform to **the internal representation** to

create a <u>first</u> first-level document", "applying the <u>second</u> first-level transform to **the internal representation** to create a <u>second</u> first-level document", and "<u>applying the second-level transform</u> <u>to the first first-level document</u> to create <u>the second-level document</u>". Claim 1.

Similarly, Applicant respectfully submits that *Wyler* in view of *Motoyama* and *Hind* fails to teach or suggest "applying a <u>first</u> first-level transform to the internal representation of the document to create a <u>first</u> first-level document", "applying a second-level transform to the <u>first</u> first-level document to create the second-level document", <u>applying a second first-level</u> <u>transform to the internal representation of the document to create a second first-level document</u>." Claims 8 and 28.

Similarly, Applicant respectfully submits that *Wyler* in view of *Motoyama* and *Hind* fails to teach or suggest "<u>a</u> second database for storing a compilation of transforms that enable an internal representation of a document to be transformed into a <u>first</u> first-level document <u>and into</u> <u>a second first-level document</u> and that enable the <u>first</u> first-level document to be transformed into a second-level document", "a document generator, coupled to the first and second databases and first and second tabular means, and to the request interface, to generate the <u>first</u> <u>first-level</u> document using at least one of the transforms<u>, to generate the second first-level document using</u> <u>at least one of the transforms that is different than at least one of the transforms used to generate</u> <u>the first-level document,</u> and to generate the second-level document using at least one of the transforms." Claim 58.

Additionally, Applicant respectfully submits that rejected claims dependent upon independent claims 1, 8, 28, or 58 are allowable for at least the same reasons as the independent claim from which the dependent claim directly or indirectly depends.

II.

Claims 53-57, and 67-69 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wyler* in view of *Motoyama*. Applicant respectfully traverses the rejection.

For at least the reasons set forth above with regard to claim 1, Applicant respectfully submits that *Wyler* in view of *Motoyama* fails to teach or suggest "transforming the document from primitive form into an internal representation of the document", "transforming the internal

representation into at least <u>a first first-level</u> document <u>and</u> into a <u>second first-level</u> document", "transforming the <u>first first-level</u> document into at least one <u>first second-level</u> document", and "transforming the <u>second second-level</u> document into at least one <u>second second-level</u> document." Claim 53.

Additionally, Applicants respectfully disagree with the Examiner that the invention of claim 53 is necessarily characterized as a "demand driven process" because such a claim limitation is not present in claim 53.

Additionally, Applicant respectfully submits that rejected claims dependent, directly or indirectly, upon independent claim 53 are allowable for at least the same reasons as claim 53.

III.

Claims 2-5 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wyler* in view of *Hind* and *Motoyama*, and further in view of U.S. Patent No. 6,772,413 to Kuznetsov (referred to herein as *"Kunetzov"*). Applicant respectfully traverses the rejection.

Applicant respectfully submits that rejected claims dependent, directly or indirectly, upon independent claim 1 are allowable for at least the same reasons as claim 1.

IV.

Claims 6 and 7 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wyler* in view of *Hind* and *Motoyama*, and further in view of Application No. 2002/0013792 to Chau (referred to herein as *"Chau"*). Applicant respectfully traverses the rejection.

Applicant respectfully submits that rejected claims dependent, directly or indirectly, upon independent claim 1 are allowable for at least the same reasons as claim 1.

V.

Claims 18-22 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Wyler* in view of *Hind* and *Motoyama*, and further in view of Application No. 2003/0014414 to Newman (referred to herein as "*Newman*"). Applicant respectfully traverses the rejection.

Applicant respectfully submits that rejected claims dependent, directly or indirectly, upon independent claim 8 are allowable for at least the same reasons as claim 8.

New Claims

For at least the reasons set forth above with regard to claim 1, Applicant respectfully submits that *Wyler* in view of *Motoyama* and *Hind* fails to teach or suggest "applying the first first-level transform to the internal representation to create a first first-level document", "applying the second first-level transform to the internal representation to create a second first-level document", and "applying the second-level transform to the first first-level document to create a second-level document". Claim 72.

For at least the reasons set forth above with regard to claim 1, Applicant respectfully submits that *Wyler* in view of *Motoyama* and *Hind* fails to teach or suggest data to cause a data processing system to "apply the first first-level transform to the internal representation to create a first first-level document", "apply the second first-level transform to the internal representation to create a second first-level document", and "apply the second-level transform to the first first-level document to create a second-level document". Claim 73.

CONCLUSION

In view of the amendments and remarks set forth herein, Applicant respectfully submits that all pending claims are in condition for allowance. Accordingly, Applicant requests that a Notice of Allowance be issued. Nonetheless, should any issues remain that might be subject to resolution through a telephone interview, the Examiner is requested to telephone the undersigned at 512-338-9100.

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Respectfully submitted,

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